

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

LORDSTOWN MOTORS CORP., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831-MFW

(Jointly Administered)

Related Docket No. 235

**CERTIFICATION OF COUNSEL REGARDING ORDER WITH
RESPECT TO THE APPLICATION OF OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ORDER AUTHORIZING THE
EMPLOYMENT AND RETENTION OF HURON CONSULTING GROUP
INC. AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS EFFECTIVE AS OF THE RETENTION DATE**

The undersigned proposed counsel to the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors in possession (the “Debtors”) hereby certifies as follows:

1. On August 7, 2023, the Committee filed the *Application of Official Committee of Unsecured Creditors for Order Authorizing the Employment and Retention of Huron Consulting Group Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of the Retention Date* (the “Application”) [Docket No. 235] with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. The notice filed with the Application established a deadline of August 21, 2023 at 4:00 p.m. (ET) (extended with respect to the Office of the United States Trustee (the “UST”) to August 22, 2023 at 4:00 p.m. (ET)) by which responses to the Application must be filed (the “Response Deadline”).

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

3. A hearing on the Application is scheduled for August 30, 2023 at 2:00 p.m. (ET).

4. Prior to the Response Deadline, the Committee received informal comments from the UST regarding the Application.

5. Other than the comments received from the UST, the undersigned certifies that she did not receive any formal or informal response to the Application. The undersigned further certifies that she has reviewed the docket in these cases and that no response to the Application appears thereon.

6. Pursuant to the UST's comments, the Committee has revised the proposed form of order approving the Application. A form of this revised order (the "Revised Order") is attached hereto as Exhibit A. The Revised Order was circulated to the UST, and the UST advised the undersigned that the UST does not oppose entry of the Revised Order.

7. Attached hereto as Exhibit B is a blackline reflecting the changes between the form of order submitted with the Application and the Revised Order.

WHEREFORE, the Committee respectfully requests that the Court enter the Revised Order at the Court's earliest convenience.

Dated: August 22, 2023
Wilmington, Delaware

Respectfully submitted,

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